

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION</b>	)	<b>MDL NO. 2804</b>
	)	
	)	<b>Case No. 1:17-md-2804</b>
<b>THIS DOCUMENT RELATES TO:</b>	)	
	)	<b>JUDGE DAN AARON POLSTER</b>
<i>City of Rochester v. Purdue Pharma L.P.,</i>	)	
No. 19-op-45853 (Track 12)	)	
	)	
<i>Lincoln County v. Richard S. Sackler, M.D.,</i>	)	
No. 20-op-45069 (Track 13)	)	
	)	
<i>City of Independence, Missouri v. Williams,</i>	)	
No. 19-op-45371 (Track 14)	)	
	)	
<i>County of Webb, Texas v. Purdue Pharma,</i>	)	
<i>L.P., No. 18-op-45175 (Track 15)</i>	)	
	)	

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL AND AMENDED  
COMPLAINTS UNDER SEAL**

Pursuant to Local Rule 5.2, PBM Bellwether Plaintiffs seek leave to file under seal their unredacted Supplemental and Amended Complaints per the Court's Order granting Plaintiffs' Motion (doc 5319).

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents."

The document Plaintiffs seek to attach contains internal language that *may* contain information that falls within the purview of the Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendments thereto (ECF #s 441, 1357, 2687, 2688). Plaintiffs respectfully request to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court's orders unless/until the

Parties can implement this Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (ECF # 1813).

WHEREFORE, Plaintiffs respectfully request this Honorable Court to grant Plaintiffs' Motion for Leave to File their unredacted Supplemental and Amended Complaints under seal.

Dated: March 6, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of March, 2024, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

s/Peter H. Weinberger

Peter H. Weinberger